

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
**FREEDOM LAW FIRM**  
8985 S. Eastern Ave, Suite 350  
Las Vegas, Nevada 89123  
(702) 880-5554  
(702) 385-5518 (fax)  
[Ghaines@freedomlegalteam.com](mailto:Ghaines@freedomlegalteam.com)  
*Counsel for Plaintiff John Pegnam*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

John Pegnam,

Plaintiff,

v.

Lac du Flambeau Band of Lake  
Superior Chippewa Indians dba  
Niizhwaaswi, LLC dba Loan at Last,

Defendant.

Case No.: 2:21-cv-01867-GMN-VCF

**Unopposed Motion for Extension of  
Time for Defendant to File a  
Responsive Pleading to Plaintiff's  
First Amended Complaint**

**(Second Request)**

1 John Pegnam ("Plaintiff"), by and through counsel, hereby files his  
 2 Unopposed Motion for Extension of Time For Defendant to File a Responsive  
 3 Pleading to Plaintiff's First Amended Complaint, and requests an order  
 4 extending the deadline for Defendant to file a responsive pleading to  
 5 Plaintiff's First Amended Complaint by thirty (30) days, from the current  
 6 deadline of April 15 , 2022 to **May 15, 2022**. This motion is submitted in  
 7 compliance with LR IA 6-1 and LR IA 6-2.

8 Good cause exists for the requested extension because the parties are  
 9 actively engaged in settlement negotiations and hope to avoid the additional  
 10 expense of preparing responsive pleadings, as without this added cost, the  
 11 parties are in a better position to reach a resolution.

12 The parties agree that an extension of Defendant's time to answer the  
 13 complaint furthers the interests of this litigation. Accordingly, Plaintiff does  
 14 not oppose the requested extension and the extension is not being requested in  
 15 bad faith or to delay these proceedings unnecessarily.

16 This is the second request for an extension of Defendant's responsive  
 17 pleading deadline.

18 For the foregoing reasons, Plaintiff requests that the Court issue an  
 19 order extending the date, to **May 15, 2022**, on which Defendant must answer or  
 20 otherwise respond to Plaintiff's Complaint.

21 Dated: April 13, 2022.

22 **FREEDOM LAW FIRM**

23 /s/ Gerardo Avalos

24 Gerardo Avalos, Esq.  
 25 8985 S. Eastern Ave., Suite 350  
 26 Las Vegas, NV 89123  
 27

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

4-14-2022

DATED: \_\_\_\_\_